

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FILED
U.S. DISTRICT COURT
2014 DEC 30 PM 12:47
S.D. OF N.Y.W.P.

-----X
MALIBU MEDIA, LLC,

Plaintiff,

vs.

JOHN DOE subscriber assigned IP address
69.120.25.240,

Defendant.
-----X

Civil Action No. _____

**COMPLAINT – ACTION FOR
DAMAGES FOR PROPERTY
RIGHTS INFRINGEMENT**

14 CV 10180

JUDGE BRICCETTI

Plaintiff, Malibu Media, LLC, sues Defendant John Doe subscriber assigned IP address 69.120.25.240, and alleges:

Introduction

1. This matter arises under the United States Copyright Act of 1976, as amended, 17 U.S.C. §§ 101 et seq. (the “Copyright Act”).

2. Defendant is a persistent online infringer of Plaintiff’s copyrights. Indeed, Defendant’s IP address as set forth on Exhibit A was used to illegally distribute each of the copyrighted movies set forth on Exhibit B.

3. Plaintiff is the registered owner of the copyrights set forth on Exhibit B (the “Copyrights-in-Suit”).

Jurisdiction And Venue

4. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question); and 28 U.S.C. § 1338 (patents, copyrights, trademarks and unfair competition).

5. Plaintiff used proven IP address geolocation technology which has consistently worked in similar cases to ensure that the Defendant's acts of copyright infringement occurred using an Internet Protocol address ("IP address") traced to a physical address located within this District, and therefore this Court has personal jurisdiction over the Defendant because (i) Defendant committed the tortious conduct alleged in this Complaint in this State, and (ii) Defendant resides in this State and/or (iii) Defendant has engaged in substantial and not isolated business activity in this State.

6. Based upon experience filing over 1,000 cases the geolocation technology used by Plaintiff has proven to be accurate to the District level in over 99% of the cases.

7. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) and (c), because: (i) a substantial part of the events or omissions giving rise to the claims occurred in this District; and, (ii) the Defendant resides (and therefore can be found) in this District and resides in this State; additionally, venue is proper in this District pursuant 28 U.S.C. § 1400(a) (venue for copyright cases) because Defendant or Defendant's agent resides or may be found in this District.

Parties

8. Plaintiff, Malibu Media, LLC, (d/b/a "X-Art.com") is a limited liability company organized and existing under the laws of the State of California and has its principal place of business located at 409 W. Olympic Blvd., Suite 501, Los Angeles, CA, 90015.

9. Plaintiff only knows Defendant by his, her or its IP Address. Defendant's IP address is set forth on Exhibit A.

10. Defendant's Internet Service Provider can identify the Defendant.

Factual Background

I. Defendant Used the BitTorrent File Distribution Network To Infringe Plaintiff's Copyrights

11. The BitTorrent file distribution network (“BitTorrent”) is one of the most common peer-to-peer file sharing systems used for distributing large amounts of data, including, but not limited to, digital movie files.

12. BitTorrent’s popularity stems from the ability of users to directly interact with each other in order to distribute a large file without creating a heavy load on any individual source computer and/or network. The methodology of BitTorrent allows users to interact directly with each other, thus avoiding the need for intermediary host websites which are subject to DMCA take down notices and potential regulatory enforcement actions.

13. In order to distribute a large file, the BitTorrent protocol breaks a file into many small pieces called bits. Users then exchange these small bits among each other instead of attempting to distribute a much larger digital file.

14. After the infringer receives all of the bits of a digital media file, the infringer’s BitTorrent client software reassembles the bits so that the file may be opened and utilized.

15. Each bit of a BitTorrent file is assigned a unique cryptographic hash value.

16. The cryptographic hash value of the bit (“bit hash”) acts as that bit’s unique digital fingerprint. Every digital file has one single possible cryptographic hash value correlating to it. The BitTorrent protocol utilizes cryptographic hash values to ensure each bit is properly routed amongst BitTorrent users as they engage in file sharing.

17. The entirety of the digital media file also has a unique cryptographic hash value (“file hash”), which acts as a digital fingerprint identifying the digital media file (e.g. a movie). Once infringers complete downloading all bits which comprise a digital media file, the

BitTorrent software uses the file hash to determine that the file is complete and accurate.

18. Plaintiff's investigator, IPP International UG, established a direct TCP/IP connection with the Defendant's IP address as set forth on Exhibit A.

19. IPP International UG downloaded from Defendant one or more bits of each of the digital movie files identified by the file hashes on Exhibit A.

20. Defendant downloaded, copied, and distributed a complete copy of Plaintiff's movies without authorization as enumerated on Exhibit A.

21. Each of the cryptographic file hashes as set forth on Exhibit A correlates to a copyrighted movie owned by Plaintiff as identified on Exhibit B.

22. IPP International UG downloaded from Defendant one or more bits of each file hash listed on Exhibit A. IPP International UG further downloaded a full copy of each file hash from the BitTorrent file distribution network and confirmed through independent calculation that the file hash matched what is listed on Exhibit A. IPP International UG then verified that the digital media file correlating to each file hash listed on Exhibit A contained a copy of a movie which is identical (or alternatively, strikingly similar or substantially similar) to the movie associated with that file hash on Exhibit A. At no time did IPP International UG upload Plaintiff's copyrighted content to any other BitTorrent user.

23. IPP International UG connected, over a course of time, with Defendant's IP address for each hash value as listed on Exhibit A. The most recent TCP/IP connection between IPP and the Defendant's IP address for each file hash value listed on Exhibit A is included within the column labeled Hit Date UTC. UTC refers to Universal Time which is utilized for air traffic control as well as for computer forensic purposes.

24. An overview of the Copyrights-in-Suit, including each hit date, date of first

publication, registration date, and registration number issued by the United States Copyright Office is set forth on Exhibit B.

25. Plaintiff's evidence establishes that Defendant is a habitual and persistent BitTorrent user and copyright infringer.

Miscellaneous

26. All conditions precedent to bringing this action have occurred or been waived.

27. Plaintiff has retained counsel and is obligated to pay said counsel a reasonable fee for its services.

COUNT I
Direct Infringement Against Defendant

28. The allegations contained in paragraphs 1-27 are hereby re-alleged as if fully set forth herein.

29. Plaintiff is the owner of the Copyrights-in-Suit, as outlined in Exhibit B, each of which covers an original work of authorship.

30. By using BitTorrent, Defendant copied and distributed the constituent elements of each of the original works covered by the Copyrights-in-Suit.

31. Plaintiff did not authorize, permit or consent to Defendant's distribution of its works.

32. As a result of the foregoing, Defendant violated Plaintiff's exclusive right to:

(A) Reproduce the works in copies, in violation of 17 U.S.C. §§ 106(1) and 501;

(B) Redistribute copies of the works to the public by sale or other transfer of ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3) and 501;

(C) Perform the copyrighted works, in violation of 17 U.S.C. §§ 106(4) and 501, by showing the works' images in any sequence and/or by making the sounds accompanying the

works audible and transmitting said performance of the works, by means of a device or process, to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definitions of "perform" and "publically" perform); and

(D) Display the copyrighted works, in violation of 17 U.S.C. §§ 106(5) and 501, by showing individual images of the works nonsequentially and transmitting said display of the works by means of a device or process to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definition of "publically" display).

33. Defendant's infringements were committed "willfully" within the meaning of 17 U.S.C. § 504(c)(2).

WHEREFORE, Plaintiff respectfully requests that the Court:

(A) Permanently enjoin Defendant and all other persons who are in active concert or participation with Defendant from continuing to infringe Plaintiff's copyrighted works;

(B) Order that Defendant delete and permanently remove the digital media files relating to Plaintiff's works from each of the computers under Defendant's possession, custody or control;

(C) Order that Defendant delete and permanently remove the infringing copies of the works Defendant has on computers under Defendant's possession, custody or control;

(D) Award Plaintiff statutory damages per infringed work pursuant to 17 U.S.C. § 504 (a) and (c);

(E) Award Plaintiff its reasonable attorneys' fees and costs pursuant to 17 U.S.C. § 505; and

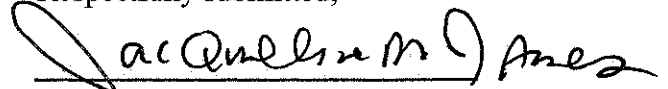
(F) Grant Plaintiff any other and further relief this Court deems just and proper.

DEMAND FOR A JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable.

Respectfully submitted,

By:

A handwritten signature in black ink, appearing to read "Jacqueline M. James", written over a horizontal line.

Jacqueline M. James, Esq. (1845)

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Attorneys for Plaintiff

ISP: Optimum Online

Physical Location: Monroe, NY

Hit Date UTC	File Hash	Title
10/07/2014 18:58:58	6E0BEC2D5843622B516F57F61E5BE08EEE0FEB2F	Taste Me
07/29/2014 00:18:29	C7F83512BA5E4C3FFECE934E98DE2EEBD8E730DD	Anneli Leila Menage A Trois
07/20/2014 23:02:41	F263DF1D141921549330CDB51DDC487D1DD51A43	Almost Famous
07/20/2014 22:49:45	3F045A78FE784D6EA44EAF240EF47CD1A16AE324	Getting Down
07/20/2014 22:41:08	31D19BE9A8127DFBE2D6D33AC23EC67CFAED4846	Move with Me
07/20/2014 16:54:29	D8CAC2CE015C6CDE8E5F5A2EC2BF263A086CAA41	A Little Rain Must Fall
07/20/2014 16:35:07	2834E4C4B376E6F2BAF4DC501C93E0CF4F2AB6F3	Spilled Milk
07/20/2014 16:32:07	D88B4C89C6AF183E648968833DB35747519C31D9	Sneaking In
07/20/2014 16:28:25	96150577D72763AFCAC8814AAB6E943F4C1BACAB	Dreams Do Come True
07/20/2014 16:28:18	F87A2E1E8D580C3A625BDE5C10DD3AF5C0BDE64E	Lovers at Home
07/20/2014 16:05:58	B5F7917A01002453F13815D60A7C484BA2414F60	Insanely Gorgeous
07/19/2014 13:07:33	54DE3F8BE0B54E1F52E3BCDFF6F1EA209FA1FFAF	Body Language
07/18/2014 19:11:56	AD7C65F7A53DB297C2445CAB3A40DFE02CB0F37B	Good Morning Baby
07/18/2014 17:48:15	8DEFB779C0FB0E97B6FD55FA1F7D1FCC1C6F9AC4	Alone Is A Dream Left Behind
07/17/2014 12:12:45	D19A878E031A30EBB1A184F99DFBFD18A3C00ED6	I Will See You In The Morning
07/17/2014 12:04:56	9C6781A6F277D3AA4ED896517023D814780F122D	A Wonderful World
07/17/2014 11:57:01	8B68096901C5CB40B1648D352B27C6AEE1291666	Then They Were Three
07/17/2014 11:28:17	4F3FF9E3442937E1306B25BC152C61BE6AFF6EDA	Veronika Coming Home
07/17/2014 11:06:30	7F7E95C9487CE032751995CC58A23CC7E0B50BEF	Tuesday Morning
07/17/2014 10:34:37	5EDF14B202FD7ACF5FCD05B19B5AF531938CF712	California Dreams
07/17/2014 10:33:00	BCCC275FBAE8790EEE7FFBC0AA6F5DDAE94D4DEE	Late for Work
07/17/2014 08:26:07	43A0A89F4DB827F203208EA0D475432958B6BF29	Like The First Time

EXHIBIT A

SNY53

Hit Date UTC	File Hash	Title
07/17/2014 06:48:56	C39C3C5AC5F9208C4C22846B4F9C274056A5000F	At Home With Tiffany
07/16/2014 16:37:39	6D1EAE7E3C719810FE077818878FA5362A9EC660	The Young and the Restless
07/16/2014 15:55:19	8E5D4B88383770091C52EE405B3602A48A1FF8B6	Just the Three of Us
07/16/2014 12:00:30	5D078FC4F665E7B3E7D80C47845956542379750F	Transcendence
07/16/2014 11:47:31	BC2FB2F0B4C21041E44FF3ED68364E5365D0856D	Wild Things
07/16/2014 11:42:23	E77F7B746C7D236EF935E348961A2546407FE3A6	Mad Passion
07/16/2014 11:42:08	DA63C2349BE26007FAA31F4ACF18A684890F264F	They Meet Again
07/16/2014 11:31:46	149B621A7854AD4251012BDA94681F3C21D72DE8	Unbelievably Beautiful
07/16/2014 11:29:56	269724BD8C02FD4F3345379C436B2F9CE22271CE	Fantasy Come True
07/16/2014 11:26:02	57AFEDEB4B1A4EDF991BA86936835610A708F80F	Coming Late
07/16/2014 11:02:58	EE7DC112CE480DC914957AC65A313AE3DEE3E64D	First Love
07/16/2014 11:01:19	03E9C1D4BF0923038011F390676CC10926F7DACD	Meet Me in Madrid
07/16/2014 10:51:53	07D2B5F0A3C56E400A6D71B8ABAE2AE7E7D4DED9	Still With Me
07/16/2014 10:19:54	E92386598F059E84358DAD878F3BFE73F9927A2C	Rose Petals
07/16/2014 10:15:10	F0C1C37D5E893FE2EE1C7A63540251077B4A7912	Snow White and the Prince
07/16/2014 09:43:03	25DC039789AAE9247F1F1DEF93BF0FC3531562A2	Happy Couple
07/16/2014 09:04:14	A116F9B14751F269A4275576C3B66FA326B10291	Hot Orgasm
07/16/2014 09:01:57	84A4A6125C335430753A643D8810F27451416DC4	Made for Each Other
07/16/2014 08:11:59	C4CC10DBB35322FDA6174F3CC972034A48F498CE	Happy Birthday Capri
07/16/2014 07:35:47	14B5574C0E73CDCCDE75D43CA9E6029A6694F8A8	So Right Its Wrong
07/16/2014 07:32:00	4842644E88162527E5D4D8B101BCE619983190F4	Raw Passion
07/16/2014 06:07:11	1C4861283F3D58BC3B3A68FF55597199291CED62	Simply Stunning
07/15/2014 22:37:10	F0D711BDD4A5F622592C4060F505CA81AB9C183B	Names
07/15/2014 22:37:02	5208BCFE4E35301F7B6840551E0840BA8C379023	Make Me Feel Beautiful
07/15/2014 22:35:54	BBC8DD724A813574ABB58DEDB08A9238AB65C2F1	Waterfall Emotions

EXHIBIT A

SNY53

Hit Date UTC	File Hash	Title
07/15/2014 21:55:15	BFFA463E61447F200B096D9E7120FDDDB1F858CC0	Going Strong
07/15/2014 21:10:21	C702327C5169DD153363EE0B5DD9C833118AEB12	Pool Party For Three
07/15/2014 20:46:42	A4BBC2D6B8C8C17AE0D5B738ACBF895905E148C5	Grow Up With Me
07/15/2014 19:50:05	D2633F1AFB8C9CF3B63F0B1E22C2837F9BECC869	My Days in Rome
07/15/2014 17:30:08	2A936E5B37749915EEDA067A54C93CF84842BEA2	New Romance
07/15/2014 17:22:22	0E1106B723F527DCD5EAFDE121D2E44943A5C77A	Threes Company
07/15/2014 16:40:12	B712D721CDDE7FF231F4CAFAD9A0FC699EB6E27E	Anneli Dream Girl
07/15/2014 12:17:29	F94BD51BD55D9F8EB91969DB6C3BEC395FB3F305	Invisible
07/15/2014 11:28:56	418612CDA063819CF12372355DCD2C2573FD0337	Truth or Dare
07/15/2014 11:01:19	8BA9BDF05B6F22BFE4E30838CD7127C88A1D6E52	Date Night at Home
07/15/2014 10:41:47	6BA1E888B0A277770FECB22BCAB0AB56F8CD8742	Working Out Together
07/15/2014 10:33:37	D40E3490DE07096BF88E98A10B5D4E0D1672F975	Fashion Models
07/15/2014 10:32:57	18DC1288637E25D7B7C9976734A7CA9C79C6C7C9	Get Wild at Home
07/15/2014 10:25:02	440CDFA1A68F0FFFB300DEE2594CC3FE572A33B	Much Needed Vacation
07/15/2014 10:12:30	E1C4CD147A01FF0CAB03187D8D90B4430F7A1CC5	Not Alone
07/15/2014 10:01:34	FF5D96473B2158BB2A6D3AEA6C16E7DD61D46311	Dancing Romance
07/15/2014 08:47:42	2A425C2975427A8037691A0F1EF6F0D21CE2399E	I Love X Art
07/15/2014 04:45:22	8C87E30CEA74E58DDBF2A3E25E8333E13C18DD09	Ready for Bed
07/15/2014 04:01:10	41B2E0CAA9E915CF9A33F06CE658BAFF199C727F	Apartment in Madrid
07/14/2014 22:50:53	D7D752A1D417EA7B1FE930C75ECE70060830CC3D	Blindfold Me Part #2
07/14/2014 21:09:23	4F8309110D236F5A477F4FD603D4628D8F7E97D2	Zeppelin on Fire
07/14/2014 21:04:04	52BE6E72821F484206CE299A71546B4DC23C0D28	Bottoms Up
07/14/2014 20:53:51	0C14A8E784BDD71479950FD8F7595933530321CE	Trophy Wife
07/14/2014 20:41:40	3B39460ABF5377A5830F532935B590D40086B834	Girls Night Out
07/14/2014 20:31:12	6D64481BDA05F43BE6C4A7F94DD9A675867C1A2C	Double Daydreams

EXHIBIT A

SNY53

Hit Date UTC	File Hash	Title
07/14/2014 20:00:35	6B8DC69DEDA7C17F9FC459CE7E7482BE52F1C442	High School Dropouts
07/14/2014 19:39:01	F3CB1E97E667A556FF06A56BB1B045D7BA9CC031	Russian Connection
07/14/2014 18:52:13	B535394D9F0AD57C6E03068BB3CF9D9234E4C960	Another Night
07/14/2014 18:34:25	7C74655AE3575D60557B5E411A938F6ABDEE12DC	Perfect Timing
07/14/2014 18:25:37	7476A27C412142B3B4F7488774E082B016CB548A	A Thought of You Part 2
07/14/2014 18:12:21	6CA5F002A486212AD9A0E265E6C0AFE4A3A2E681	Chloe Loves Carl Part 2
07/14/2014 18:08:33	0A9495760C51B2EA408ADC90C8A41AC17F67A425	Catching Up
07/14/2014 18:02:59	4A73AE9DD9898E64D250D7781E8D92ACDD79E523	Risky Business
07/14/2014 18:00:33	00C13D33EBDBEDD8A8A3E4DA68B9A33B614E20A9	Blindfold Me Baby
07/14/2014 17:56:17	BE8C24E5306BD4C706C60ADD1130FD78B9970E83	Tantric Massage
07/14/2014 17:54:09	55476DB0F16D822FE4E53445C15669823FB3B57E	Double Tease
07/14/2014 17:20:18	1BED6A751D4E44BFFB2798BB16C9C602A913B1F2	Just Watch Part 2
07/14/2014 17:02:01	5A6906D1E0E14EEB305A1E6D2A8CB7EB3D164403	Give Me More
07/14/2014 16:54:42	E2FB0812F2C1BDC78DB48CA92059EFEC12D8043D	Epic Love
01/13/2014 12:35:26	0ABD96E0353DFDDF8774E1750497C88940F9115C	Arrest Me
01/13/2014 03:00:14	6AEB1C6EE53231898DF06C6C42418872593B9F3E	My Naughty Girl
12/16/2013 17:33:28	EBCCB75A9E2A8ED79E1BA39144E7D4299EC14EDB	Lying Around
12/16/2013 15:46:31	24C96BAA4F7BD1A7EE94428E7BC918FEC48A2F43	Love at First Sight
11/14/2013 13:40:27	FADBF8B5BCD099A0995125EB3EE671026F92B68D	Dream Come True
11/14/2013 01:13:45	86BEBFB9BD38DF05448D85FD43807F3A83FE3423	Morning Desires
11/14/2013 00:44:48	A679F2D2D24787C5B384F543ED7C7919638B3BFC	Vacation Fantasy

Total Statutory Claims Against Defendant: 93

EXHIBIT A

SNY53

Copyrights-In-Suit for IP Address 69.120.25.240

ISP: Optimum Online

Location: Monroe, NY

Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
Taste Me	PA0001912773	08/27/2014	09/17/2014	10/07/2014
Anneli Leila Menage A Trois	PA0001771662	01/13/2012	01/17/2012	07/29/2014
Almost Famous	PA0001864687	09/27/2013	09/30/2013	07/20/2014
Getting Down	PA0001838601	04/25/2013	05/14/2013	07/20/2014
Move with Me	PA0001878980	02/11/2014	02/13/2014	07/20/2014
A Little Rain Must Fall	PA0001822653	01/23/2013	01/27/2013	07/20/2014
Spilled Milk	PA0001833299	03/08/2013	04/01/2013	07/20/2014
Sneaking In	PA0001860962	08/17/2013	09/08/2013	07/20/2014
Dreams Do Come True	PA0001851979	06/26/2013	06/27/2013	07/20/2014
Lovers at Home	PA0001868816	11/05/2013	11/10/2013	07/20/2014
Insanely Gorgeous	PA0001885205	03/19/2014	03/24/2014	07/20/2014
Body Language	PA0001868096	10/26/2013	11/01/2013	07/19/2014
Good Morning Baby	PA0001847655	06/04/2013	06/18/2013	07/18/2014
Alone Is A Dream Left Behind	PA0001860984	08/24/2013	09/10/2013	07/18/2014
I Will See You In The Morning	PA0001874746	01/14/2014	01/15/2014	07/17/2014
A Wonderful World	PA0001847651	05/27/2013	06/17/2013	07/17/2014
Then They Were Three	PA0001817761	12/09/2012	12/16/2012	07/17/2014
Veronika Coming Home	PA0001774761	01/25/2012	02/03/2012	07/17/2014
Tuesday Morning	PA0001828897	02/26/2013	03/12/2013	07/17/2014
California Dreams	PA0001780564	03/12/2012	03/12/2012	07/17/2014
Late for Work	PA0001833360	03/15/2013	04/12/2013	07/17/2014

EXHIBIT B

SNY53

Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
Like The First Time	PA0001778844	02/29/2012	02/29/2012	07/17/2014
At Home With Tiffany	PA0001880496	02/17/2014	02/21/2014	07/17/2014
The Young and the Restless	PA0001843111	05/05/2013	05/15/2013	07/16/2014
Just the Three of Us	PA0001880670	02/21/2014	02/27/2014	07/16/2014
Transcendence	PA0001799577	07/30/2012	07/31/2012	07/16/2014
Wild Things	PA0001809287	10/05/2012	10/07/2012	07/16/2014
Mad Passion	PA0001831083	02/28/2013	03/12/2013	07/16/2014
They Meet Again	PA0001866049	10/11/2013	10/16/2013	07/16/2014
Unbelievably Beautiful	PA0001805315	08/24/2012	09/10/2012	07/16/2014
Fantasy Come True	PA0001874629	12/19/2013	12/26/2013	07/16/2014
Coming Late	PA0001904286	06/19/2014	06/24/2014	07/16/2014
First Love	PA0001806476	09/05/2012	09/25/2012	07/16/2014
Meet Me in Madrid	PA0001847658	06/12/2013	06/30/2013	07/16/2014
Still With Me	PA0001813360	11/02/2012	11/19/2012	07/16/2014
Rose Petals	PA0001838598	04/17/2013	04/28/2013	07/16/2014
Snow White and the Prince	PA0001846095	05/22/2013	06/17/2013	07/16/2014
Happy Couple	PA0001794461	06/25/2012	06/25/2012	07/16/2014
Hot Orgasm	PA0001903922	06/03/2014	06/12/2014	07/16/2014
Made for Each Other	PA0001860974	07/31/2013	08/29/2013	07/16/2014
Happy Birthday Capri	PA0001846087	05/24/2013	06/17/2013	07/16/2014
So Right Its Wrong	PA0001872084	12/01/2013	12/04/2013	07/16/2014
Raw Passion	PA0001860979	08/18/2013	09/02/2013	07/16/2014
Simply Stunning	PA0001843103	05/03/2013	05/14/2013	07/16/2014
Names	PA0001843106	05/10/2013	05/14/2013	07/15/2014
Make Me Feel Beautiful	PA0001859651	07/25/2013	08/01/2013	07/15/2014

EXHIBIT B

Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
Waterfall Emotions	PA0001817757	12/05/2012	12/16/2012	07/15/2014
Going Strong	PA0001859660	07/06/2013	08/02/2013	07/15/2014
Pool Party For Three	PA0001859656	07/13/2013	08/01/2013	07/15/2014
Grow Up With Me	PA0001866185	10/17/2013	10/19/2013	07/15/2014
My Days in Rome	PA0001886187	03/28/2014	04/02/2014	07/15/2014
New Romance	PA0001860972	08/05/2013	09/03/2013	07/15/2014
Threes Company	PA0001804939	08/17/2012	08/21/2012	07/15/2014
Anneli Dream Girl	PA0001769489	12/19/2011	01/04/2012	07/15/2014
Invisible	PA0001826860	02/19/2013	02/21/2013	07/15/2014
Truth or Dare	PA0001846099	05/16/2013	06/30/2013	07/15/2014
Date Night at Home	PA0001864689	09/29/2013	09/30/2013	07/15/2014
Working Out Together	PA0001824841	01/30/2013	02/07/2013	07/15/2014
Fashion Models	PA0001838599	04/19/2013	04/28/2013	07/15/2014
Get Wild at Home	PA0001877470	01/22/2014	01/31/2014	07/15/2014
Much Needed Vacation	PA0001866083	10/21/2013	10/21/2013	07/15/2014
Not Alone	PA0001889410	04/09/2014	04/15/2014	07/15/2014
Dancing Romance	PA0001903915	06/07/2014	06/12/2014	07/15/2014
I Love X Art	PA0001833296	03/29/2013	04/01/2013	07/15/2014
Ready for Bed	PA0001831199	02/24/2013	03/07/2013	07/15/2014
Apartment in Madrid	PA0001826992	02/16/2013	02/18/2013	07/15/2014
Blindfold Me Part #2	PA0001867890	11/03/2013	11/06/2013	07/14/2014
Zeppelin on Fire	PA0001874614	01/04/2014	01/05/2014	07/14/2014
Bottoms Up	PA0001838596	04/13/2013	04/28/2013	07/14/2014
Trophy Wife	PA0001883767	03/05/2014	03/22/2014	07/14/2014
Girls Night Out	PA0001762409	11/14/2011	11/23/2011	07/14/2014

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Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
Double Daydreams	PA0001869246	11/13/2013	11/21/2013	07/14/2014
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Russian Connection	PA0001886189	03/30/2014	04/02/2014	07/14/2014
Another Night	PA0001833359	03/13/2013	04/12/2013	07/14/2014
Perfect Timing	PA0001895848	05/07/2014	05/16/2014	07/14/2014
A Thought of You Part 2	PA0001895665	05/13/2014	05/16/2014	07/14/2014
Chloe Loves Carl Part 2	PA0001906561	07/05/2014	07/14/2014	07/14/2014
Catching Up	PA0001889391	04/13/2014	04/15/2014	07/14/2014
Risky Business	PA0001878455	02/01/2014	02/18/2014	07/14/2014
Blindfold Me Baby	PA0001902971	05/30/2014	06/06/2014	07/14/2014
Tantric Massage	PA0001892180	04/25/2014	04/29/2014	07/14/2014
Double Tease	PA0001892183	04/17/2014	04/29/2014	07/14/2014
Just Watch Part 2	PA0001902964	05/27/2014	06/06/2014	07/14/2014
Give Me More	PA0001904311	06/17/2014	06/24/2014	07/14/2014
Epic Love	PA0001898091	05/25/2014	06/06/2014	07/14/2014
Arrest Me	PA0001871941	11/25/2013	11/29/2013	01/13/2014
My Naughty Girl	PA0001868094	10/28/2013	11/01/2013	01/13/2014
Lying Around	PA0001872754	12/10/2013	12/15/2013	12/16/2013
Love at First Sight	PA0001872756	12/14/2013	12/15/2013	12/16/2013
Dream Come True	PA0001800356	07/13/2012	07/20/2012	11/14/2013
Morning Desires	PA0001819292	12/31/2012	01/08/2013	11/14/2013
Vacation Fantasy	PA0001814250	11/10/2012	11/28/2012	11/14/2013

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